

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHERRY LANG and  
KYOWANNA LANG,

Plaintiffs,

v.

ALLEGIANCE ACCOUNTING SERVICES,  
LLC,

Defendants.

1:19-cv-06452

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT**

**To the Clerk of the U.S. District Court for the Northern District of Illinois**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiffs SHERRY LANG AND KYOWANNA LANG, requests that the Clerk of this Honorable Court enter the default of Defendant ALLEGIANCE ACCOUNTING SERVICES, LLC, for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the affidavit of Nathan C. Volheim, Esq. attached hereto.

Dated: November 6, 2019

Respectfully submitted,

s/ Nathan C. Volheim  
Nathan C. Volheim, Esq. #6302103  
*Counsel for Plaintiff*  
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**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiffs, certifies that on November 6, 2019, he caused a copy of the foregoing **PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT**, to be served on all parties of record via ECF and by U.S. Certified mail, postage prepaid, email and fax to:

Allegiance Accounting Services, LLC  
c/o Tarar Redden, R/A  
60 Lemon Street  
Buffalo, New York 14204

Allegiance Accounting Services, LLC  
1841 Seneca Street  
Buffalo, New York 14210

**[CONTACT@ALLEGIANCEACCOUNTINGSERVICES.COM](mailto:CONTACT@ALLEGIANCEACCOUNTINGSERVICES.COM)**

Fax: (844) 245-7913

Fax: (888) 239-1602

Respectfully submitted,

s/ Nathan C. Volheim

Nathan C. Volheim, Esq. #6302103